

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

v.

CASE NO.: 23-CV-24299

AMOR DE JESUS CORP., et al.,

Defendants.

/

DEFENDANTS' JOINT RESPONSE TO PLAINTIFF'S STATEMENT OF CLAIM

COME NOW, the Defendants Amor De Jesus Corp., (“ADJ Corp”) and Sweet Living Facility, LLC (“Sweet Living”) and Jose Machado (“Mr. Machado”) and Zelmira Quinonez (“Z. Quinonez”) and Aminta Quinonez (“A. Quinonez”) (collectively, “Defendants”) by and through the undersigned counsel, and file their Joint Response to Plaintiff’s State of Claim:

1. Defendants dispute that Plaintiff is owed any money. Plaintiff was paid at the lawful rates and overtime rate.
2. Defendants are without knowledge as to the allegations contained in paragraphs 1 and 2.
3. Defendants deny the allegations contained in paragraphs 3, 4, and 5; Plaintiff is not owed monies as a result of the alleged violation of Florida Minimum Wage Act.
4. Defendants deny the allegations contained in paragraphs 6, 7 and 8; Plaintiff is not owed monies as a result of the alleged violation of Fair Labor Standard Act.
5. Defendants deny the allegations contained in paragraphs 9, 10 and 11; Plaintiff is not owed monies as a result of the alleged violation of FLSA Overtime Wage Violation.
6. Defendants are without knowledge as to the allegations contained in paragraphs 12, 13, 14, and 15.

WHEREFORE, Defendants respectfully request that Plaintiff’s prayer for relief be denied and whatever other relief it deems just and reasonable.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing pleading has been electronically filed and served via EM/ECF on this 18th day of December 2023.

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